

Kristyn Waldhauser

From: Hur, Soo Jin <shur@sughrue.com>
Sent: Wednesday, May 31, 2023 6:45 PM
To: 'ServiceBOE-Element@fr.com'; 'ServiceMoto-Element@fr.com'; 'melissa@gillamsmithlaw.com'; 'tom@gillamsmithlaw.com'
Cc: _ELEMENT; thad@heartfieldlawfirm.com
Subject: Element Capital Commercial Company PTE. LTD v. BOE Technology Group Co., Ltd. et al (C.A. No. 22-118)

[This email originated outside of F&R.]

Dear Mr. Colaianne,

As you requested in your letter to John Rabena of March 16, 2023, the link below contains claim charts for all of the accused products known to date, as well as an updated Infringement Contention cover document. As we have noted in the past, the infringement contentions for these products are similar to those set forth in the original contentions for the OLED panel in the RAZR. We have, however, added contentions for claims 23 and 35 of the '736 patent.

<https://www.sendthisfile.com/BZSeCusDixbTnOXICxZWbRen> (the link will expire in 8 days)

We intend to move forward to supplement Element's contentions consistent with the attached. Please let us know if BOE will oppose.

Counsel for Motorola, please let us know if Motorola will oppose our motion as well.

On behalf of
John Rabena

Soo Jin Hur

Manager, Litigation Paralegal Department

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